COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

TARIFF FILING OF KENERGY CORP. TO) Case No. IMPLEMENT DEMAND-SIDE MANAGEMENT) 2012-00143 PROGRAMS

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO KENERGY CORP.

Kenergy Corp. ("Kenergy"), pursuant to 807 KAR 5:001, is to file with the Commission the original and six copies of the following information, with a copy to all parties of record. The information requested herein is due within ten days of the date of this request. Responses to requests for information shall be appropriately bound, tabbed and indexed. Each response shall include the name of the witness responsible for responding to the questions related to the information provided.

Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Kenergy shall make timely amendment to any prior response if it obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which Kenergy fails or refuses to furnish all or part of the requested information, Kenergy shall

provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied material to ensure that it is legible.

- 1. Refer to the proposed tariffs filed on April 9, 2012.
- a. Refer to proposed Original Sheet Nos. 49 and 50, the Energy Star Refrigerator Replacement Incentive Program and the Residential High Efficiency Heating, Ventilation and Air Conditioning ("HVAC") Program tariffs, respectively. In the "Customer Incentives" sections of both tariffs, it states that Kenergy Corp. will pay or reimburse "one of its residential customers" an incentive. Explain the use of the phrase "one of its residential customers" and state whether it is Kenergy's intention to limit the incentive to one per household.
- b. Refer to proposed Original Sheet No. 51, the Touchstone Energy New Home Program tariff. The "Purpose" section references "one of three specified types of Energy Star rated HVAC systems" that could be installed under this program. However, four types are listed in the "Customer Incentives" part of the tariff. Did Kenergy intend for the "Purpose" section to refer to "one of four specified types of Energy Star rated HVAC systems"? If no, explain.
- c. Refer to proposed Original Sheets Nos. 53 and 53A, the Commercial/Industrial High Efficiency Lighting Replacement Incentive Program tariff. The term "Rural Customers" is used throughout this tariff. Did Kenergy intend to refer to "Commercial and Industrial customers" rather than to "Rural Customers"? If no, explain.
- 2. Refer to the proposed tariffs filed on April 24, 2012, proposed Original Sheet No. 55, the Residential Weatherization Program-Primary Heating Source Non-

Electric and Electric-Sourced Air Conditioning. The "Member Incentives" section states that "Kenergy Corp. will provide 25% of the cost of approved residential weatherization improvements performed in accordance with this program." In the Residential Weatherization Program tariff filed by Big Rivers Electric Corporation, ¹ Kenergy's wholesale supplier, it states that "Big Rivers will provide 50% of the cost of residential weatherization improvements performed in accordance with this program." Did Kenergy intend to use "50%" rather than "25%" in this section? If no, explain the reason for the difference in the percentage of weather normalization costs that will be covered by Kenergy and Big Rivers.

3. Provide Kenergy's plan for promoting the programs included in the proposed tariffs.

Jeff Derouen Executive Director

Public Service Commission

P.O. Box 615

Frankfort, Kentucky 40601

DATED ______

cc: Parties of Record

¹ <u>See</u> Case No. 2012-00142, Tariff Filing of Big Rivers Electric Corporation to Implement Demand-Side Management Programs, filed March 16, 2012.

J. Christopher Hopgood Dorsey, King, Gray, Norment & Hopgood 318 Second Street Henderson, KENTUCKY 42420

Sanford Novick President and CEO Kenergy Corp. P. O. Box 18 Henderson, KY 42419